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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EVE E. MAZZARELLA, and  
 MELISSA R. BEECROFT,

Defendants.

2:08-CR-064-JCM-EJY

**Government's Unopposed Motion to  
 Extend Time to File its Motions Regarding  
*Honeycutt, Thompson*, and the Eighth  
 Amendment as Applied to the Defendants  
 or to Settle under ECF No. 863  
 (Ninth Request)**

This Motion to Extend Time is the ninth request. LR IA 6-1.

The United States of America respectfully moves this Court for an Order extending the time for the government to file its Motions Regarding *Honeycutt, Thompson*, and the Eighth Amendment as Applied to the Defendants or to Settle under ECF No. 835. The reason is the parties are actively engaged in negotiations to resolve the forfeiture matters. The current deadline is May 6, 2022. The government requests an extension until August 4, 2022.

The forensic review of the records is completed. The parties continue to negotiate the settlement of their respective forfeiture amounts. The two defendants need more time to review the forensic records, the underlying documents, the summary, and the analysis of these many records.

Negotiations stalled because Eve E. Mazzarella retained new counsel.

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1 On April 19, 2022, John Kirby, counsel for Eve E. Mazzearella, agreed to this  
2 extension. On April 20, 2022, Angela Dows, counsel for Melissa R. Beecroft, agreed to this  
3 extension.

4 Because of the foregoing reasons, the government requests the extension of time until  
5 August 4, 2022, for the defendants to finish reviewing the records, defendants and the  
6 government to settle, and if settlements do not occur, to place the required documents on a  
7 computer program as evidence, to file motions, responses, replies, and to have a forfeiture  
8 hearing.

9 This Motion is not submitted solely for the purpose of delay or for any other  
10 improper purpose.

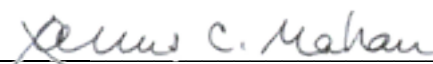
11 This Court should grant an extension of time to, and including, August 4, 2022.

12 DATED: April 21, 2022.

13 CHRISTOPHER CHIOU  
14 Acting United States Attorney

15 /s/ Daniel D. Hollingsworth  
16 DANIEL D. HOLLINGSWORTH  
17 Assistant United States Attorney

18 IT IS SO ORDERED:  
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20   
21 JAMES C. MAHAN  
22 UNITED STATES DISTRICT COURT JUDGE

23 DATED: April 25, 2022  
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**CERTIFICATE OF SERVICE**

A copy of the foregoing was served upon counsel of record via Electronic Filing on April 21, 2022, and by

First Class Mail:

John D. Kirby  
Counsel for Eve Mazzarella  
401 West A. St. Suite 1150  
San Diego, CA 92101

/s/ Heidi L. Skillin  
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HEIDI L. SKILLIN  
FSA Contractor Paralegal